

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
 )  
BALMORAL RACING CLUB, INC., ) Case No. 14-45711  
 )  
Debtor. ) Honorable Donald R. Cassling  
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In re: ) Chapter 11  
 )  
MAYWOOD PARK TROTTING ) Case No. 14-45718  
ASSOCIATION, INC., )  
 ) Honorable Donald R. Cassling  
Debtor. )  
 ) Hearing Date: December 30, 2014  
 ) Hearing Time: 9:30 a.m.  
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on **Tuesday, December 30, 2014, at 9:30 a.m.** we shall appear before the Honorable Donald R. Cassling of the United States Bankruptcy Court for the Northern District of Illinois, or any other judge sitting in his place and stead, at Courtroom 619 in the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and then and there present the **MOTION OF DEBTORS FOR ENTRY OF AN ORDER DIRECTING JOINT ADMINISTRATION OF CASES**, a copy of which is hereby served upon you.

CHAD H. GETTLEMAN, ESQ. (ARDC #944858)  
NATHAN Q. RUGG, ESQ. (ARDC #6272969)  
ALEXANDER F. BROUGHAM, ESQ. (ARDC #6301515)  
ADELMAN & GETTLEMAN, LTD.  
53 West Jackson Blvd, Suite 1050  
Chicago, Illinois 60604  
Tel (312) 435-1050  
Fax (312) 435-1059  
**Proposed Counsel for Balmoral Racing Club, Inc. and  
Maywood Park Trotting Association, Inc.**

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that true and correct copies of this notice and motion were served upon the parties listed on the service list attached hereto via CM/ECF, overnight delivery, and/or facsimile, as indicated therein, on November 24, 2014.

By: /s/ Nathan Q. Rugg \_\_\_\_\_

## **SERVICE LIST**

### **VIA FAX:**

Empress Casino Joliet Corporation  
Des Plaines Development Limited  
Partnership  
Hollywood Casino-Aurora, Inc.  
Elgin Riverboat Resort-Riverboat Casino  
c/o Robert Andelman, Esq.  
542 South Dearborn, 10<sup>th</sup> floor  
Chicago, IL 60605  
FAX: 312-341-0700  
*Litigation Counsel*

c/o Jeremy D. Margolis, Esq.  
Loeb & Loeb LLP  
321 North Clark Street, suite 2300  
Chicago, IL 60654  
FAX: 312/277-8957  
*Litigation Counsel*

Patrick S. Layng, Esq.  
Office of the U.S. Trustee  
Region 11  
219 S. Dearborn Street, Room 873  
Chicago, IL 60604  
FAX: 312-886-5794

Eric S. Rein, Esq.  
Horwood Marcus & Berk, Chartered  
500 West Madison, suite 3700  
Chicago, IL 60661  
FAX: 312/606-3232  
*represents FirstMerit Bank*

James D. Newbold, Esq.  
Assistant Attorney General,  
Revenue Litigation Bureau  
Office of the Illinois Attorney General  
100 West Randolph Street, suite 13-222  
Chicago, IL 60601-3218  
FAX: 312/814-3589  
*represents State of Illinois/IRB*

Doug Lipke, Esq. (Bankruptcy Counsel)  
Vedder Price, P.C.  
222 North LaSalle Street, suite 2600  
Chicago, IL 60601-1104  
FAX: 312/609-5005  
*represents Empress Casino Joliet Corporation, Des Plaines Development Limited Partnership, Hollywood Casino-Aurora, Inc., Elgin Riverboat Resort-Riverboat Casino Bankruptcy Counsel*

Joseph D. Frank, Esq./Frances Gecker, Esq.  
324 North LaSalle, Suite 623  
Chicago, IL 60654  
FAX: 312/276-0035  
*represents Illinois Harness Horsemen's Association*

Scott R. Clar, Esq.  
Crane Heyman Simon Welch & Clar  
135 South LaSalle Street, suite 3705  
Chicago, IL 60603-4101  
FAX: 312/641-7114  
*represents John Johnston*

RGS  
Red Rock Administrative Services  
9275 West Flamingo Road, Suite 120  
Las Vegas, NV 89147  
attn.: Rob Terry  
FAX: 702/243-6885

MidAmerican Energy Company  
P.O. Box 8020  
Davenport, IA 52808  
attn.: Paula Paaske  
FAX: 563/333-8749

Woodbine Entertainment  
55 Rexdale Boulevard, Box 156  
Toronto, Ontario, Canada M9W 5L2  
attn.: Chermain Simon  
FAX: 416/213-2127

Illinois Harness Horsemen's Association  
15 Spinning Wheel Road, Suite 406  
Hinsdale, IL 60521  
attn.: Tony Somone  
FAX: 630/323-0761

Roberts Communications Network  
4175 Cameron Street, suite 10  
Las Vegas, NV 89103  
attn.: Todd Roberts/Joanne Colon  
FAX: 702/227-7585

Expressbet  
200 Racetrack Road, bldg. 26  
Washington, PA 15301  
attn.: Krystal Parish  
FAX: 724/229-6226

Northfield Park Associates, LLC  
10705 Northfield Road  
P.O. Box 374  
Northfield, OH 44067  
attn.: Sharon Pratt  
FAX: 330/468-8975

Delta Downs  
2717 Delta Downs Dr.  
Vinton, LA 70668  
attn.: Mary Migues  
FAX: 337/589-3542

Pompano Park Assoc.  
1800 S.W. Third Street  
Pompano Beach, FL 33069  
attn.: Heather Belmonte  
FAX: 954-972-9970

Penn National c/o MRTA  
P.O. Box 32  
Grantville, PA 17028  
attn.: Adrienne Hill  
FAX: 717/469-3397

Yonkers Raceway  
810 Central Avenue  
Yonkers, NY 10704  
attn.: Toni Gallow  
FAX: 914/457-2419

New Meadowslands Racetrack LLC  
Pari Global Solutions, Inc.  
7950 Dublin Blvd., suite 216  
Dublin, CA 94568  
attn.: Laura Nevels  
FAX: 925/803-8168

Red Mile  
c/o Lexington Trotters Breeders Assn, LLC  
1200 Red Mile Road  
P.O. Box 420  
Lexington, KY 40588  
attn.: Susan Denny  
FAX: 859/258-7697

Amwest Entertainment LLC  
13011 W. Highway 42, suite 107  
Prospect Heights, KY 40059  
attn.: Brittany Goodman  
FAX: 502/292-1076

Monarch Content Management  
285 West Huntington Drive  
Arcadia, CA 91007  
attn.: Xenia Prato  
FAX: 626/821-1523

Churchill Downs  
c/o United Tote Settlement Dept.  
600 N. Hurstbourne Pkwy, suite 400  
Louisville, KY 40222  
attn.: Tara Stout  
FAX: 502/638-3893

Del Mar Thoroughbred Club  
2260 Jimmy Durante Blvd.  
Del Mar, CA 92014  
attn.: Laurie McKee  
FAX: 858/792-6157

Evangeline Downs  
2235 Creswell Lane  
Opelousas, LA 70570  
attn.: Del Perry  
FAX: 337/942-4599

Arlington Park International Race Course  
2200 W. Euclid Ave  
Arlington Heights, IL 60005  
attn: Dan Peters  
FAX: 847-255-4331

Cook County Collector  
PO Box 641847  
Chicago, IL 60664-1847  
attn: Maria Pappas  
FAX: 312-603-2147

Hawthorne Race Course  
3501 South Laramie Ave  
Cicero, IL 60804  
attn: Pam Nickels  
FAX: 708-780-3677

Illinois Harness Horsemens Asn  
15 Spinning Wheel Road  
Suite 432  
Hinsdale, IL 60521  
attn: Tony Simone  
FAX: 630-323-0761

Ohio Settlement Agent  
P.O. Box 374  
Northfield, OH 44067  
attn: Ben Moldovan  
FAX: 330-468-8975

Pari Global Solutions, Inc  
7950 Dublin Blvd, Suite 216  
Dublin, CA 94568  
attn: Laura Nevels  
FAX: 925-803-8168

Premier Gateway International  
4th Floor, Victory House Extension  
24-28 Prospect Hill  
Douglas Isle Of Man IM1 1EQ UK  
attn: Donna Hughes  
FAX: 44 1624-613968

Remington Park  
One Remington Place  
Oklahoma City, OK 73111  
attn: Chris Beam  
FAX: 972-642-9363

Village Of Melrose Park  
1000 N. 25<sup>th</sup> Ave.  
Melrose Park, IL 60160  
attn: Rose Vasquez  
FAX: 708-343-8015

**VIA OVERNIGHT DELIVERY:**

Elite Turf Club  
5340 Runningbrook Road  
Las Vegas, NV 89120  
attn.: Sam Kirshenbaum

DuPage County Treasurer  
421 N. County Farm Rd.  
Wheaton IL 60189  
attn: Gwen Henry

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
 )  
BALMORAL RACING CLUB, INC., ) Case No. 14-45711  
 )  
Debtor. ) Honorable Donald R. Cassling  
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In re: ) Chapter 11  
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MAYWOOD PARK TROTTING ) Case No. 14-45718  
ASSOCIATION, INC., )  
 ) Honorable Donald R. Cassling  
Debtor. )  
 ) Hearing Date: December 30, 2014  
 ) Hearing Time: 9:30 a.m.  
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**MOTION OF DEBTORS FOR ENTRY OF AN ORDER  
DIRECTING JOINT ADMINISTRATION OF CASES**

NOW COME Balmoral Racing Club, Inc. (“**Balmoral**”) and Maywood Park Trotting Association, Inc. (“**Maywood**”), debtors and debtors in possession (collectively, the “**Debtors**”), and, though their undersigned proposed counsel, hereby move this Court, pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order directing the joint administration of their respective chapter 11 cases for procedural purposes only (the “**Motion**”). In support of the Motion, the Debtors respectfully state as follows:

**I. FACTUAL BACKGROUND**

1. On December 24, 2014 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 et seq. (the “**Code**”). Since the Petition Date, the Debtors have remained in possession of their

assets and have continued to operate their businesses as debtors in possession in accordance with 11 U.S.C. §§ 1107 and 1108.

2. Neither a trustee nor a committee of unsecured creditors has been appointed in the Chapter 11 Cases.

3. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue lies properly in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). The predicates for the relief requested herein are section 105(a) of the Code and Rule 1015 of the Bankruptcy Rules.

4. The nature of the Debtors' businesses and the factual background relating to the commencement of the Chapter 11 Cases are set forth in more detail in the Declaration of Randall Olech in Support of Chapter 11 Petitions and First-Day Motions<sup>1</sup> (the "**Declaration**") filed on the Petition Date and incorporated herein by reference.

## **II. RELIEF REQUESTED**

5. By this Motion, the Debtors seek an order directing the joint administration of these Chapter 11 Cases, for procedural purposes only, subject to Bankruptcy Rule 1015(b).

6. The joint administration of the Chapter 11 Cases will obviate the need for duplicate notices, applications, and orders, and thereby save considerable time and expense for the Debtors and, consequently, their estates. The Debtors anticipate that numerous notices, applications, motions, pleadings, hearings, and orders will affect several of the Debtors.

7. Joint administration will also save time and money and avoid duplication and potentially confusing filings by permitting counsel for all parties in interests to (a) use a single caption on the numerous documents that will be served and filed in the Chapter 11 Cases; and (b)

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<sup>1</sup> Any capitalized terms not otherwise defined in the Motion shall have the same meaning as ascribed in the Declaration.

file papers in one case rather than in multiple cases. Joint administration will also protect parties in interest by ensuring that parties to each of the Chapter 11 Cases are apprised of all the various matters before the Court in these cases.

8. The rights of the respective creditors of the Debtors will not be adversely affected by joint administration of these Chapter 11 Cases, because each creditor may still file its claim against a particular estate; the relief sought is purely procedural and is in no way intended to affect substantive rights. In fact, the rights of all creditors will be enhanced by the reduction in costs resulting from joint administration.

9. The Clerk of the Court will also be relieved of the burden of entering duplicative orders and maintaining duplicative files. Finally supervision of the administrative aspects of the Chapter 11 Cases by the Office of the United States Trustee will be simplified.

10. For the foregoing reasons, the interests of the Debtors and their creditors and equity security holders would be best served by joint administration of the Chapter 11 Cases.

11. To facilitate the joint administration of the Chapter 11 Cases, the Debtors request that the official caption to be used by all parties in the jointly administered cases be as follows:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
BALMORAL RACING CLUB, INC., and	)	Case No. 14-45711
MAYWOOD PARK TROTTING	)	(Jointly Administered)
ASSOCIATION, INC.,	)	
	)	Honorable Donald R. Cassling
Debtors.	)	
	)	

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12. The Debtors also request that a docket entry substantially similar to the following be entered on the docket of each case that is not the lead case to reflect the joint administration of the Chapter 11 Cases:

An order pursuant to Federal Rule of Bankruptcy Procedure 1015(b) has been entered in this case directing the joint administration of the chapter 11 cases of Belmont Racing Club, Inc. (Case No. 14-45711) and Maywood Park Trotting Association, Inc. (Case No. 14-45718). In re Belmont Racing Club, Inc. has been designated the “lead” case. Accordingly, the docket in Case No. 14-45711 should be consulted for all matters affecting the chapter 11 case of this debtor.

### **III. BASIS FOR RELIEF REQUESTED**

13. Pursuant to Bankruptcy Rule 1015(b), if two or more petitions for relief are pending in the same court by or against a debtor and an affiliate or general partner, the court may order joint administration of the cases. The Debtors are “affiliates” as that term is defined in section 101(2) of the Code; one hundred percent (100%) of the issued and outstanding stock in both Debtors is held by a holding company, World Wide Wagering, Inc., a Delaware corporation. Accordingly, this Court is authorized to grant the relief requested herein.

14. Section 105(a) of the Code also provides this Court with the power to grant the relief requested herein. Section 105(a) states that a bankruptcy court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions” of the Code. 11 U.S.C. § 105(a).

### **IV. NOTICE**

15. Notice of the filing of this Motion and the hearing scheduled therefor has been provided by CM/ECF, overnight delivery, and/or facsimile to: (a) the Office of the United States Trustee for the Northern District of Illinois; (b) Balmoral’s 20 largest unsecured creditors pursuant to Federal Rule of Bankruptcy Procedure 1007(d); (c) Maywood’s 20 largest unsecured

creditors pursuant to Federal Rule of Bankruptcy Procedure 1007; and (d) all other parties who have requested notice and service of pleadings in either of the Chapter 11 Cases. In light of the nature of the relief requested, the Debtors submit that no other or further notice is required.

WHEREFORE, Balmoral Racing Club, Inc. and Maywood Park Trotting Association, Inc., debtors herein, respectfully request the entry of an order in accordance with the foregoing recommendations in the form filed herewith and made a part hereof without further notice, and for such other and further relief as is just.

Respectfully Submitted,

BALMORAL RACING CLUB, INC. and  
MAYWOOD PARK TROTTING  
ASSOCIATION, INC.

By: /s/ Nathan Q. Rugg  
One of their proposed attorneys

CHAD H. GETTLEMAN, ESQ. (ARDC #944858)  
NATHAN Q. RUGG, ESQ. (ARDC #6272969)  
ALEXANDER F. BROUGHAM, ESQ. (ARDC #6301515)  
ADELMAN & GETTLEMAN, LTD.  
53 West Jackson Blvd., Suite 1050  
Chicago, Illinois 60604  
Tel (312) 435-1050  
Fax (312) 435-1059  
**Proposed Counsel for the Debtors**